

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

IN RE:

Robert Todd Culp  
dba KOA Properties  
dba Woodpointe

Debtor.

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CASE NO. 19-02578-RLM-13

**OBJECTION TO PLAN**

Comes now JPMorgan Chase Bank, National Association (hereafter "Claimant"), by counsel, and for its Objection to Plan, herein alleges and states as follows:

1. The Debtor executed and delivered to Wachovia Mortgage Corporation a first mortgage on February 6, 2004, mortgaging and warranting real estate commonly described as 1324 Pearl Street, Anderson, Indiana 46016 (hereafter "Mortgage"). Mortgage was thereafter assigned to Claimant.
2. Claimant filed its Proof of Claim on June 13, 2019 setting forth a pre-petition mortgage arrearage in the estimated sum of \$121.40 and total estimated secured claim of \$5,434.14.
3. Debtor's Amended Chapter 13 Plan filed February 5, 2020 appears to propose to cram down the lien of Claimant to \$5,000.00, payable at 0% interest.
4. The Debtor has indicated a value of the subject Real Estate as \$15,000.00, which is sufficient to support the payment of Claimant's entire claim, including at the contract rate of interest.

WHEREFORE, Claimant objects to the Debtor's Plan in that the Debtor is impermissibly seeking to cramdown Claimant's lien interest.

Dated: 2-2-20

  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has, on the 2 day of March, 2020, electronically filed the foregoing. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

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- Trevor Wayne Wells twells@reminger.com, mwantuch@reminger.com

I further certify that on the 2 day of March, 2020, a copy of the foregoing was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

Robert Todd Culp  
146 Nursery Road  
Anderson, IN 46012

  
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Fredric Lawrence

**This communication is from a debt collector and is an attempt to collect a debt; any information obtained will be used for that purpose.**